

Harley-Davidson Motor Company, 11800 W. Capitol Drive, Wauwatosa, WI 53222 414/616-1000

June 24, 2003

Docket Management
Room PL-401
400 Seventh Street, SW
Washington, DC 20590

Re: Request for public comment on proposed collection of information, U.S. DOT
Docket Number NHTSA-2003-14375

Dear Sir or Madam:

The following are the comments of Harley-Davidson Motor Company to the above docket item.

Introduction

Harley-Davidson Motor Company (hereinafter Harley-Davidson, The Motor Company or HDMC) is the nation's oldest and largest manufacturer of motorcycles. Staff took an active role in the work of the National Agenda for Motorcycle Safety (NAMS) and the Motor Company and serve with various national and international organizations on safety related projects. We have a vital interest in favoring promising research in motorcycle safety.

Research into motorcyclist attitudes and behavior was identified as an "essential" research need (NAMS at page 15). We understand and appreciate that the agency has to operate under resource limitations. However, Harley-Davidson does not believe that the proposed study is the most appropriate path to take to obtain the information needed by government, the public or industry.

Utility of the Methodology

The agency has proposed to seek a convenience sample of motorcyclists, especially “older” motorcyclists at various venues attractive to many of the operators of these vehicles. Such convenience samples may be of utility when trying to find “normal” or “average” people going about their daily business in a shopping center or mall. Almost everyone needs to shop to meet daily needs. However, there are several dangers inherent about using this sample selection method for people who are attending motorcycling (or any other) social events.

Introduction of bias. There is reason to believe that selection of such a sample will only be determinative of the norm for those attracted to attend and with the leisure to attend a particular event. There will be no check on whether the attendees of such events are normative for the population of motorcycle operators.

Introduction of extreme levels of bias. The interviewers will be directed to focus on riders over 40. This will involve some sort of “profiling” of potential subjects. Given that bias will already have been introduced into the sample as described above, this profiling could further skew the results.

Reaching for an alternative methodology.

Understanding the market demographics. Much of the information sought by the agency could be reflective of changes in the market and the customer base. Therefore, the first step should be an enhanced understanding of the market and its demographics. We recommend that the agency seek this first. The not-for-profit Motorcycle Industry Council compiles such information and the agency could explore using them as a resource.

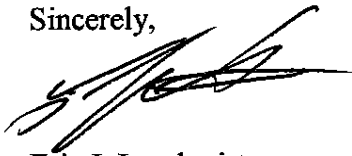
The need for a representative sample. If there is no way to check the representative nature of the sample selected, then any strategies selected to decrease accident or fatality rates will be immediately suspect. We therefore recommend that the agency perform a representative telephone survey among known owners of motorcycles. Lists of owners are available from such services as the Polk organization, and although possibly intensive to wade through, from lists of owners available from the various state motor vehicle administrations. Upon completion of this step, the sample should be weighted to reflect the known vehicle parc or sales numbers for the years selected.

Conclusion

Harley-Davidson Motor Company agrees that research into motorcyclist attitudes and behaviors would be a positive move. However, we do not agree that the proposed methodology is the appropriate mechanism for doing so. There are some acceptable solutions available for improving this methodology that the agency should utilize.

Thank you for the opportunity to submit these comments. If there are any questions, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric J. Lundquist', written over a horizontal line.

Eric J. Lundquist
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